

Appl. No. 09/774,964  
Amdt. Dated September 6, 2005  
Reply to Final Office Action of April 4, 2005

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### REMARKS/ARGUMENTS

Claims 1, 5, 11 and 12 have been rejected under 35 U.S.C. §103(a) as being obvious over United States Patent Publication No. 2002/0129236 to Nuutinen ("Nuutinen") in view of United States Patent Publication No. 2002/0021465 to Moore, Jr. et al. ("Moore").

The primary reference relied upon by the Examiner is Nuutinen. The Examiner has cited Nuutinen as teaching the use of a User Agent Server (UAS) and a User Agent Client (UAC). The Examiner states that Nuutinen fails to teach the connection of the UAS processor to the appliance and cites Moore to overcome this deficiency.

First, applicants agree that the sections of Nuutinen cited by the Examiner teach basic Session Initiation Protocol (SIP) functionality. Applicants, however, are not attempting to claim basic SIP functionality. Rather, applicants have claimed a system and method wherein SIP is used to communicate with networked appliances through a network appliance system proxy server (Proxy) located between the UAC and the UAS for receiving and conveying information between the UAS and the UAC. Applicants agree that the proxy is not disclosed in Nuutinen.

Applicants do not believe that the additional Moore reference overcomes the deficiency alleged by the Examiner to exist in Nuutinen. The Moore reference is in a completely different area of endeavor as it is related to a gateway at the home which is between a hybrid fiber coax network and one or more networked home devices. There is no contemplation of the problems or issues associated with using SIP to communicate with networked appliances. Applicants respectfully submit that the Moore et al. does not contain any teaching or suggestion that would encourage one to combine the teachings and apply them to the field of SIP based control of networked appliances. The Examiner states that Moore teaches the use of a home networking gateway (HNG) to map between communication protocols used in the in-home network and the protocols used in the Hybrid Fiber Coaxial (HFC) network. The Examiner states "[t]hereby, the reference teaches that the HFC-specific protocols are immaterial to CG (HNG) and can be replaced to handle SIP . . . ." Applicants submit that there is no teaching of SIP at all in Moore. There would be no motivation to use the home networking gateway of Moore which is designed to translate between various home and external networking protocols and insert that gateway into the use of SIP disclosed in Nuutinen. Neither reference teaches or discloses the use of a network appliance system proxy server located between the UAC and the UAS for receiving and

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conveying information between them wherein the Proxy has address mapping capability for directing messages through the appropriate UAS processor.

With respect to claim 5, applicants do not see the translation of networking protocols from a HFC to an in-home network as teaching the translation of the message and command formats between a SIP UAS and the networked appliances. Translation from one protocol or format in itself is not new, however, the use of a network appliance system proxy server to accomplish translation in a networked appliance system using SIP is novel and neither Nuutinen nor Moore, alone or in combination, teach or suggest such a system. There is no motivation in Moore to apply its teachings to a networked appliance system using SIP.

With regard to claims 11 and 12, again applicants disagree that there is any motivation to combine a home networking gateway in an HFC system with the basic teachings of SIP. Applicant believes that none of the references alone or in combination teach or suggest a SIP based system for communications between a client and at least one networked appliance, having a user agent server (UAS) processor connected to said appliance so as to relay commands to said appliance and receive status information from said appliance; a user agent client (UAC) processor having the capacity to send SIP command messages intended for said appliance to said UAS processor over a communications network and to receive over the communications network status information messages about said appliance from said UAS processor, said UAS processor translating received SIP commands into commands recognized by the appliance and translating information provided by said appliance into SIP status messages for transmission over the communications network to said UAC processor; and a network appliance system proxy server (Proxy) located between the UAC and the UAS for receiving and conveying information between them wherein the UAS processor does use address mapping capability for handling at least some of the messages to and from the appliances; and wherein Proxy has address mapping capability to direct said at least some messages through the appropriate UAS processor to the appliance to which they are addressed.

Furthermore, the Examiner has rejected claims 2, 3, 4, 6-10 and 13-16 under 35 U.S.C. §103(a) as being obvious over Nuutinen in view of Moore further in view of United States Patent Publication No. 2002/0091757 to Cuomo et al. ("Cuomo"). With regard to claim 2 the Examiner cites Nuutinen for the basic SIP architecture and Moore for the home networking gateway. The Examiner then identifies a deficiency in the combined teachings of Nuutinen and Moore and overcomes that by citing Cuomo as teaching the claimed authentication capabilities found in

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claim 2 of the present application. Applicants reiterate their position that there is no motivation to combine the Nuutinen and Moore references and furthermore, there is no motivation to add the teachings of a third reference. Cuomo teaches the use of authentication but does not teach or suggest the use of a network appliance system proxy server which performs authentication rather than having authentication performed at the UAS. There is no discussion of SIP in Cuomo.

With respect to claims 3, 4, 6-10 and 13-16 the Examiner cites various combinations of Nuutinen, Moore and Cuomo. Applicants submit that the primary flaw in this analysis is the failure to find in any of the references any motivation for such a combination. The hybrid fiber coax network of Moore is so different from the basic SIP architecture discussed in Nuutinen that there is no motivation to combine such references. Cuomo discusses the use of an authentication server but does not teach or suggest the use of a Proxy in a SIP based system of networked appliances whereby the proxy server performs the translation, authentication and other functions of the SIP UAS in order to perform such functions at the Proxy rather than at the UAS.

Applicants submit that claims 1 through 16 are allowable. Applicants hereby request reconsideration of claims 1-16, in view of the above discussion, and allowance thereof is respectfully requested.

Respectfully submitted,



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